

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPISOUTHERN DISTRICT OF MISSISSIPPI  
FILED

AUG 17 2018

BY ARTHUR JOHNSTON, DEPUTY

## COMPLAINT

ANDERSON  
(Last Name)#560485  
(Identification Number)LEONARD  
(First Name)

(Middle Name)

Wilkinson County Correctional Facility (W.C.C.F.)

(Institution)

2299 Hwy. 61-North  
Woodville, Ms. 390609

(Address)

(Enter above the full name of the plaintiff, prisoner, and address  
plaintiff in this action)

V.

CIVIL ACTION NUMBER:

5:18-cv-91 - PCB-MTP

(to be completed by the Court)

Management Training Corporation,  
SUED IN THEIR INDIVIDUAL CAPACITYJody Bradley (Warden)Gabriel Walker (Warden of Security)Pelicia Hall (Commissioner) of M.D.O.C.

(Enter above the full name of the defendant or defendants in this action)

Jury Trial  
REQUESTED

## OTHER LAWSUITS FILED BY PLAINTIFF

## NOTICE AND WARNING:

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

A. Have you ever filed any other lawsuits in a court of the United States? Yes () No ()

B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse side of this page or additional sheets of paper.)

1. Parties to the action: Anderson v. Glenn Hamilton, chairman, Shannon Warkock, Board member, Walter Tolbert, Board member, and Clarence E. Brown, Board member  
(2.) Anderson v. Shannock Warkock (chairman), Emmitt L. Sparkman, Deputy Additional page →
2. Court (if federal court, name the district; if state court, name the county): 1) United States District Court  
Southern District - Jackson Division (2) United States District Court Eastern Division
3. Docket Number: (1) 3:07-CV-728 DPL-JCS, (2) 4:10-CV-01281 RA HTW, (3) 4:16-
4. Name of judge to whom case was assigned: (1) JAMES C. SUMMER, (2) Linda R. Anderson Additional page →
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): (1.) WAS DISMISS NO APPEAL, (2.) DISMISS, APPEAL WAS TAKEN - Additional page →

page 2 of 28

continue from page 1

Commissioner; Bartley Grimes - Deputy Warden; unknown Moore,  
Mental Health Counsel, unknown Smith, Casemanager of Unit 5.

(3.) Mississippi Department of Corrections, Norris Morris, Steven Pickett,  
Clarence Brown, Ernest Lee, Timothy Morris, unknown Sturdivant,  
Andrew Mills, unknown Cox; Kathryn McIntyre, Richard Pennington,  
Dr. Angela Brown, Ricky Scott, Nola Nelson, Unknown John Doe, (1)  
C.I.D., unknown McCoy; unknown Burt; Charles Hall; Timothy Outlaw;  
unknown Garrison; unknown Vance-MTC-; Gale Williams psych Dr.;  
Pamela Robinson; Unknown Johnson, unknown Munford, unknown  
Weeks; Marshall Fisher, unknown Alexander; Kray Washington, Parole  
board Supervisor; all are being sued in their official and individual  
capacity -

(2.) COURTS continue from page 1 : (3) United States District Court  
Northern Division - Greenville, Miss.

(3.) DOCKET NUMBER: 4:16-cv-0101.DMB-JMV; NO. 17-60754

(4.) Name of Judge to whom case was assigned continue from page 1

- (3.) Debra M. Brown,

(5.) DISPOSITION: FIFTH CIRCUIT STATED THAT THE CASE IS (MUDOT!)

(3.) DISMISS, APPEAL IS PENDING RIGHT NOW; IN THE FIFTH CIRCUIT  
COURT OF APPEALS; DISTRICT COURT JUST SENT ORDER DENY IN -  
forma pauperis; FIFTH CIRCUIT. STATE I MUST SEND A 'BRIEF'  
challenging the DISTRICT COURT RULING. July 2, 2018

## PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank. Do the same for additional plaintiff, if any).

I. Name of plaintiff: LEVONZEL ANDERSON Prisoner Number: #56485  
 Address: Wilkinson County Correctional Facility (WCCF)  
2999 Hwy. 61-North  
Woodville, Ms. 39669

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional defendants.)

II. Defendant: Management Training Corporation (M-T-C) is employed as  
HEADQUARTERS at 500 N. MARKET  
PLACE DRIVE; CENTERVILLE, UT. 84014  
 is Being sued in their INDIVIDUAL CAPACITY

The plaintiff is responsible for providing the court the name and address of each plaintiff(s) as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

## PLAINTIFF:

NAME: Levoncel Anderson ADDRESS: Wilkinson County Correctional Facility  
#56485 - PRSE. 2999 Hwy. 61-North  
Woodville, Ms. 39669

## DEFENDANT(S):

NAME: Jody Bradley ADDRESS: Wilkinson County Correctional Facility  
(Warden) being sued in  
his OFFICIAL CAPACITY 2999 Hwy. 61-North  
\* Woodville, Ms. 39669

NAME: Gabriel Walker ADDRESS: Wilkinson County Correctional Facility  
(Deputy-Warden) being  
sued in his OFFICIAL and -  
INDIVIDUAL 2999 Hwy. 61-North  
Woodville, Ms. 39669

Continue From page 2

PARTIES

## DEFENDANT(S)

## NAME:

4. Tonya Toomey

Warden of Programs, being - 2999 Hwy. 61-North

sued in her official and Woodville, Ms. 39669  
individual capacity

5. Larry Lee

MDOC

Contract monitor  
is being sued in his official  
and individual capacityWilkinson County Correctional  
Facility

2999 Hwy. 61- North

Woodville, Ms 39669

6. Unknown Tapan

MDOC

Compliance Officer is -  
being sued in her official  
and individual capacityWilkinson County Correctional  
Facility

2999 Hwy. 61- North

Woodville, Ms. 39669

7. Felicia Hall

M.D.O.C.

Commissioner

Being sued in their officials.

Mississippi Department of Correction

capacity

633 North State Street

Jackson, Ms. 39202

8. Sean K. Smith

MDOC

Correction Investigation  
DivisionBeing sued in his official -  
and individual capacity

Mississippi Department of Correction

633 North State Street

Jackson, Ms.

39202

9. Unknown Gale

Psych. Counsel

being sued in his -  
official and individual  
capacity

Wilkinson County Correctional Facility

2999 Hwy. 61- North

Woodville, Ms.

~~39669, 39668~~

39669

10. Dr. Unknown Dunn

Psych. Doctor, being

sued in her official and -  
individual capacity

Wilkinson County Correctional Facility

2999 Hwy. 61- North

Woodville, Ms.

~~39669, 39668~~

39669

continue from page 2

PARTIES

11. Unknown Turner Wilkinson County Correctional Facility  
(INVESTIGATOR) 2999 Hwy. 61 - North  
 sued in his official and Woodville, Ms. 39669  
 individual-capacity

12. Unknown Arbuthnot Wilkinson County Correctional Facility  
Casemanager Supervisor 2999 Hwy. 61 - North  
 sued in his official and Woodville, Ms. 39669  
 individual-capacity

13. Unknown Arrington Wilkinson County Correctional Facility  
Casemanager 2999 Hwy. 61 - North  
 sued in his official and Woodville, Ms. 39669  
 individual-capacity

14. Jane DOE Wilkinson County Correctional Facility  
 2999 Hwy. 61 - North  
 Woodville, Ms. 39669

15. JOHN DOE Wilkinson County Correctional Facility  
 2999 Hwy. 61 - North  
 Woodville, Ms. 39669

16.

GENERAL INFORMATION

A. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?

Yes () No ()

B. Are you presently incarcerated for a parole or probation violation?

Yes () No ()

C. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?

Yes () No ()

D. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?

Yes () No ()

E. Have you completed the Administrative Remedy Program regarding the claims presented in this complaint?

attached Yes () No () if so, state the results of the procedure: See look at the exhibits  
to (17-18) pages

F. If you are not an inmate of the Mississippi Department of Corrections, answer the following questions:

1. Did you present the facts relating to your complaint to the administrative or grievance procedure in your institution?

Yes () No ()

2. State how your claims were presented (written request, verbal request, request for forms): They where  
all writing with (grievances and notices) see Exhibits: BR-0  
still haven't receive any response for any of the officials →

3. State the date your claims were presented: \_\_\_\_\_

4. State the result of the procedure: P.R.E.A. violations, where supposed to be sent  
to Sean K. Smith (C.I.D) M.D.O.C. HEADQUARTERS, only one response back  
from his assistance Mr. Zachary Houston, P.R.E.A. Coordinator (CIA)  
after I file many complaint this the only was corresponded to - .

Other 'they' state they can't do nothing about the problem, or its  
out of our hands.. WCCC/MTC staff. see 17-18 pages

17.

## EXHAUSTION

Plaintiff has EXHAUSTED ALL AVAILABLE ADMINISTRATIVE REMEDIES REGARDING THE MATTER, described in this complaint or civil action on Jan. 22, 2018 date, plaintiff mailed his administrative remedy program here at the Wilkinson County Correction Center or Facility (WCC) at the Legal Claims office, at several different dates see Exhibits: HT001-2 - For the claiming the same incidents of 'Prison Rape Elimination Act of 2003' ~ Since plaintiff arrived on (March 22nd, 2017) he been advised that all legal claims, were sent to the Mississippi Department of Correction (MDOC) at the Correction - Investigation Division (C.I.D.) Unit - Sean K. Smith office, who never response but 'once', plaintiff on none of the (P.R.E.A of 2003) violation that taken place with him. EXHIBIT: BR007- -BR008

18.

Plaintiff further wrote the Warden of Programs Ms. Tierney, on Jan. 9, 2018 date, who come in talk with me with the (invest.) Turner, on these continuing patings of sexual assaults by these former 'Gang Members', with (NOTICE) given still nothing was gone about it left on the zone, as you can see plaintiff made "good faith efforted", to comply with the 'EXHAUSTION' requirement, but is still unable; to receive any relief -

Defendant(s) still ignore the warnings left me here →

on DELTA POD: For more sexual assaults / abuse to happen as if they are part taken in these assaults with the inmates or they in communication with these inmates??

STATEMENT OF CLAIM

III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet if necessary.)

Anderson is subjective to Ongoing sexual abuse by State and Private Prison officials and gang members in which these officials deny Anderson the right to be "PROTECTED FROM HARM," Equal Protection, Due Process of law, Against ARBITRARY Government Action, A violation of the 1<sup>st</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendment of the United States Constitution.

Continue from page 17-73

RELIEF

IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

(Prayer For Relief)

Wherefore, plaintiff respectfully pray that this court enter judgment, Granting plaintiff Anderson, a declaration that the acts and Omissions described herein violate his rights under the Constitution and laws of the United States) and -

Continue from page 66-71

Signed this 8<sup>th</sup> day of

August

, 20 18

Levinel Anderson #504185  
2000 Hwy 61-North (WCCC.)  
Woodville, MS. 376049

Signature of plaintiff, prisoner number and address of plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

August 8, 2018  
(Date)

Levinel Anderson  
Signature of plaintiff

CONTINUE FROM EXHAUSTION

a. thes very zone, where all these sexual assault taken place. 'DELTA' pool at Wilkinson County Correctional Facility (W.C.C.F.) ~ Protective Custody (P.C.)

17. Upon information and belief:

18. STATEMENT OF CLAIMS

Anderson is subjective to Ongoing sexual abuse by State and private prison officials and gang-members, in which these officials deny Anderson the right to be "Protected From Harm", Equal Protection, Due Process of Law, Against arbitrary government actions; A violation of the 1<sup>st</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendment of the United States Constitution

19. "Wilkinson County Correctional Facility or Center" is why?! The Correctional Investigation Division (CID) Lola Nelson, requested that Anderson, be sent by transfer, to this prison on Protective Custody (PC) that hold sum '1400' inmates mostly 'C-custody inmate; B-custody, sum (PC) Exhibit: 58(c)(d),

20. On March 22, 2017, on Arrival Anderson told all available counseLS, "That he's in fear of his life", do to - inmates are sexual attacking me in my sleep! " I can't be housed in a cell with another inmates. And that I need to be in a cell by myself! All counseLS stated "We don't have single cell," and you'll have to deal with it... .

21. First Sexual Assault or Abuse on July 2, 2017, July 10, 2017. Anderson, had roommate (Raymond Pitts) who (after sexual assault him in his sleep? Then has another inmate to come in the cell while I'm in the shower punches' him in the eye, so he can leave out the cell "in fear" I'll do something to him. On July 10, 2017 date.

22. {Second sexual assault or abuse} On 5/23/17 while in my cell, sleep ofc William had allowed several inmates inside my cell 208, and who did lords knows what!! While I was sleep I did a (ARP) on these 'sexual assaults', over the months, but its like they isn't trying to hear my "cry". % Williams quit. see Exhibits: BR-042, 43, 44

23. Place sick calls in wrote Warden, but the attacks keeps on coming, so I notice something wasn't right! These peoples aint that crazy; its "something can awaken me up in a dead sleep" have me feeling drizzy like I've taken medications and I know I haven't! I ~~ever~~ feeling uncomfortable ways when I wake up. As if someone was "tempting with me while I was sleep.

24. This 'DEVICE' can tell when or what I'm thinking, they are running some kinda 'test', on me without my permission, for consent. I wrote the Psych. Dept. for answer, and have to file grievances, on these staff and still couldn't receive the answer but, they keep on with the sexual harassment using these inmates on this pod see Exhibits: CA-006, BR-014, BR-016(b) & BR-025(a)(b)

25. EVEN writing the Warden of Programs, Ms. Toomey I still couldn't get, the harassment to stop. And she never believe me in the first place making statement with 'Investigator Turner', that Andersen, is lying about the allegations of being sexual assaulted in his sleep. Cause one should be able to feel such action while they are sleep! ~ And not one time did they get any [TEST-

done; to see if I was indeed telling the truth. see -  
Exhibit: BRD19, BRD18A

26. Further, the two(2) told Anderson that he couldn't complain about the 5<sup>th</sup> of February, 2018. He was told to pick up by the Warden of Program T. Toomey, she never told me where; later the even, Ct Gaksin and a Sgt. came and took me to (Ad Seg) cell: 102, where I was verbally harassed all day and night inmates have the Dance, and cell: 108, and the cell, echo's when you talk. The whole time being harassed their. So Anderson, calls the <P.R.E.A.HOT-LINE>; and complained about the "verbal harassment" while being harassed, Exhibit: BR-018(a), BR-020(a)(b),

27. When the two(2) came Warden Toomey, and the (Investigator) Turner, they came complaining about me, not being able to use the (HOTLINE) verbally harassment by saying "I couldn't state that I'm being verbally harassed and that it was for guys sexual contact".

28. I stated "Verbally too!" - Warden Toomey, stated "IF I call the <P.R.E.A./HOTLINE> Again. That she'll write me, a Rule VIOLATION Report (R.V.R.)"

29. (Investigator) Turner, stated "That IF I call again. He'll place me and 'General Population'; Anderson stated "I-

aint scared of no damn! P.Purlation!" "Take me now!"  
Turner, ~~he~~ told the FLOOR OFFICER TO GET HIM SOME CUFFS!  
She did. He open the door, put the cuff after taken my  
shoes off. Push me up against the wall, took one my legs  
then took my shoes off. Got the other leg took the shoes off  
"WHN?" Exhibits: BR-007, BR-014, 12, 18(a),

30. Put the shackles on, walk me out off the (Ad Seg)  
zone, right up the Hall infront of a Group of inmates, whos  
in red & white C-custody. And Andersen, plantiff-whos a  
1.) Protective Custody inmate, 2.) he's a "black & white B-  
custody who don't suppose to be around each other from  
them get go. And to top it off none of them didn't have  
on any 'restrints' what's ever, which made it more better for  
the gang members to cause harm, if they chose.

31. Get me in the holding tank area, push me up  
against the wall, "Told me not to say another word!", Get  
the keys, open the deer, push me in, close it then left.

32. Later he takes me up the hallway, in my boxers  
in socks, to (H-J-K), TO J-Pod cell 209 "Told the inmates  
if I call P.R.E.A / Abram, that He'll let one of the guy come  
in my cell in "RAPE" me! I said "DON'T →

let him get you' k--!" He left, see, Exhibit: BR-07, 18(c), This is Mr. Turner, 'second time,' he threaten me, used profane language, being unprofessional.

Anderson, states "He no certin of what's going on with him. Upon information and belief: Over the years dealing with gang members, or staff tampering with him at night or whenever they can drug him up!" and gone to sleep. . .

33. This "PROGRAM!" I call it, is a very serious 'deal', cause the inmate don't mine getting were true, losing their own lives, staff taken chances on losing their jobs or their lives, they are putting it on the line everyday in order for me to make the right move. so they maybe written down as they turn in my 'mind' whenever this (DEVICE) goes wrong on me. They'll need a inmate to put it back in its place this is why?! I must be in the room with a inmate at all time. so they'll break the 'rules', in order for this to take place. see, Exhibit: BR-013(c).

34. Cause this been going on for (five) 5 year since (2013) at Marshall County Correctional Facility (M.C.C.F.) this is where the (implant chip) was instored in top of -

my anal, by "Private Doctors," who I want to their free world clinic to have the 'surgery' done; a black older man and a white older man who owns the clinic setting right off the highway. Both where medical doctors plus, they where homosexuals; and they where the first ones to place this [monitor device inside me.] At Holly-Springs, Ms.

35. And to justify them violating my private area, they will not, put me in a cell by myself. To keep "gang members" from 'repeatedly' sexual assaults, or abuse me, to keep these device working, with the other inmates to make like its some type of homosexual game', to keep my mind through off of what's really going on. And they can never, go away, knowing these inmates are doing whatever it is, to me while I'm in a deep sleep! ~ see First Complaint: Anderson vs. Morris no 4:16cv101 DMB-JMV, and "all Exhibits" of this complaint.

36. Management Training Corporation, Mississippi,  
Department of Correction, are aware of  
Anderson going through this "Intentional  
Infliction of Emotional Distress", by these  
State and Private Officials

37. Anderson, written all the mention staff, who listed inside this complaints, and they are aware of him being sexual assaulted by these inmate over and over, again. Who "Upon information and belief" - That he wrote the following (ARPs) NOTICES, LETTERS, THAT LISTED AS EXHIBITS: HIC01,002, CA003, 004, 005, 006, BR00A, 007, BR00A, BR00B-19

38. How whenever I'm doing something other then, what these inmates, have putting down with, they'll make their way to have other inmate" to walk in my path, as I may be going to the (Microwave); or walk around the zone for exercise.

39. The (Gang Members) will have inmate to grab their privance whenever they infront or my present... This is a form of 'DISRESPECT' to make my mind get off the point of thinking of what it needs to be thinking! on just recently July 2<sup>nd</sup> 2018. When cell: 112, 111, 110, 109, 108, 107, came out together. look at the inmates who walks infront of me, several times each time there was a (white guy) look at the top tier- as well how the 'white guy' tryed to knock me over, when walking by him. We were just let off a three (3) months "lockdown"

40. And the 30<sup>th</sup> of June, 2018. Inmates had the <Monitoring Device> over , the cell I'm in now. Making like the can understand what's my mind thinking. Calling me names such as: Punks, GAYS, homos, I'm guessing they are trying to make 'react' or 'hallucin!' Turn me into what they are? This Device also can 'wake' one out of a bad sleep! (under control) switch. Just

to hear these inmate inflect verbal harassment, on me  
Imposing 'Psychological Trauma' "WAKING ME UP OUT OF  
MY SLEEP!" So this device, is the reason(s) I can't feel  
these inmate, going inside my anal. Due to them having control  
over my (mind and body).

41. Anderson AT NO TIME GAVE THE  
MANAGEMENT TRAINING CORPO-  
RATION (M-T-C), nor the STATE  
MISSISSIPPI DEPARTMENT OF -  
CORRECTION (M.D.O.C.) PERMISSION  
or CONSENT, TO "RECORD, MONITORING  
MY ACTIONS, AND SEXUAL HARASSED"  
Anderson THROUGH ANY COURSE OF -  
These "PRISON RAPE ELIMINATION ACT-  
OF 2003" / violations.

42. Anderson, never told the officials of State and Private  
that he will allow them to make the necessary steps or tests,  
to see if I'm in fact been, sexual abuse, by state and private,  
officials and inmate who's playing the big part of this, who  
can let the staff of all he's writing, saying to give the  
staff officials the upper hand... Or try and correct the matter  
before I can write the 'courts, or and Media' concerning these  
(sexual assaults) that's taken place with Anderson OVER YEARS!  
see, EXHIBIT: ALL ATTACHED HT, CA, BR,  
page 18 of 28

43. Officials may call courts ahead of time, and state that Anderson is a 'mental patient'; And that they are running tests on him to determine if his eligibility for parole release, but are indeed violating his 8<sup>th</sup> and 14<sup>th</sup> Amendment - rights under United States Constitution.

44. At "NO TIME," did And give these folk/staff member no anyone from the C.I.D. Sean K. Smith, M.D.D.C., personnel permission to run any test on me. On March 5, 2018. Dr. Dunn, call me in her office, at Wilkinson County Correctional Facility (W.C.C.F.) ask me a few question then told me, what I have is call (Delusional) seeing, hearing things that's not there; she also had me sign for my new medications I ask Dr. Dunn, was I signing anything that <sup>might</sup> hurt me? She stated "N/A" its just saying I gave you "Zyprexa and two (2) beryldrils" I did not sign for any program, to be played on me at no time!

45. On February 4<sup>th</sup> or 5<sup>th</sup>, 2018. I sign some more papers by Warden of Programs Tammy' who said I was signing papers said that my cellmate didn't rape ~~any~~ on that date. Another paper saying that I was seen by Medical and that I refuse to be seen by medical personnel. Cause I wash all the evidence off of my body part. Just for that date (above) is the only papers I remember signing. Never a paper authorize any state or private official to run [RAPE test] on me... And they are doing (illegal testes) on me. Exhibits:

46. On March 5, 2018, I was call to the Clinic Psych. Dept. when I made it Dr DAWN, was in the cell who I told of these sexual assaults, in my sleep! She said that I'm have a mental state call (Delusional) that I see things that's really not their and that aint nothing really happen with me. Its all in my mind see,

Exhibits: BR-052, BR-054, BR-056(a), BR-056(7), BR-057(a)

47. "IF" its all in mind, why I'm writing this - complaint; about being sexual abuse over the year! I'm seeing inmates grabbing on themselves, calling me punk! Gay! homo! etc. And I wake up I be feeling 'drugged' as if some one was putting something in my <sup>mouth or feet</sup> while I was sleep!

48. Anderson, states: why all these illegally acts are continue to happen? Warden of Security, Gabriel Walker hasn't said anything on the incident reports why haven't these inmates been written up a rule violation report (RVR) or even charge of that matter? Why, was I place back on the Pod these incident took place and not at another facility or in a cell by myself? So I can't accuse any one in the cell with me; if I'm having [delusional] thoughts?! Exhibit: BR-057(a)

49. Why the officers on the night shift are not checking in these cell like they are suppose to; or have a (flight light) for the cell that's to dark, and they can't see in?

a {Branch of Security}

50. CASEMANAGERS Arrington & Tolliver Conspired

in keeping Anderson incarcerated over his -

time, by not giving him all the parole papers

he'll need to sign, to have a fair parole hearing

The Casemanager here on 'C-D-E' section who will come around once a month. Arrington who was the case worker when I come up for parole back in (January 11, 2017) didn't give me the papers to have; so I can send to the Newspapers for General Circulation, notice (2) two weeks; And I have a Murder charge according to §47-7-17 miss. code ann. In order for the board to make their decision, on the inmate who's serving a 'life-sentence' with parole. see Exhibit: BR-013(a), BR-016(a)(b), BR-028(a),

51. After the 'Board' denied Anderson parole C-D-E had a new case manager Tolliver, who refuse to give me the goldform decision of the parole. "Upon information and belief" she wanted me to give me this form, hoping that I would have went 'crazy' over the boards decision, of a one (1) year set off. Before she give me the 'gold copy', never the less Anderson, keeps his cool. Ms. Tolliver, sent the gold copy to him at Administrative

Segregation (Ad. Seg.) where he was in a cell by himself. Couldn't no one do nothing to him why his sleep. And he - couldn't do nothing to anyone.

52. At All time the Warden Judy Bradley had (notice) of all incidents dealing with Anderson, but yet allow the inmates and staff at this facility to continue with the denial of Protection From Harm 20.05.01; with Larry Lee, Ms. Tapan the M.D.O.C. Compliance officers; and the United States District Court Northern District Court, Greenville, Ms. Also had knowledge of the P.R.E.A. incident take place with me. At case no. 4:16-cv-101-DMS-OMV, they're the first peoples to know of it... And it still gone on right! Today. Without any (Medical Health Care) provide even if I deny the treatment. Their are still supposed to have give me. Examined???

53.

### DELIBERATE • INDIFFERENCE

54. Defendants) M-T-C, J. Bradley, G. Walker, T. Terney, L. Lee Tapan, P. Hall, S.K. Smith, Hale, Dr. Dunn, Turner, Arbutnott, Arrington; had knowledge of This "Prison Rape Elimination Act of 2003", that is taken place with Anderson, at this Wilkinson County Correctional Facility or Center. While in cell: 208, Ad. Seg. 'J-Pod', Delta: 107, 207, 203, and 109, at no time was Anderson (medical evaluated), during these sexual abuse by inmates; over the years of the Ongoing P.R.E.A. violation of Anderson

And they fail to act reasonably or at all.

55. Defendants J. Bradley, J. Abathnot, Arrington, Gale all knew of Anderson wanted to be in a cell by himself, so these attack wouldn't keep on occurring with him; as he sleeps! Cause they are aware of the civil suit (~~Retaliation~~) Anderson have on the M.D.O.C. 1 Defendants which one of them who sent me down here 'C.I.D. / P.R.E.A./ Coordinated Lola Nelson, was aware of me not being able to be place in a ONE MAN CELL. She still sent me down here anyways.

56. All (above) defendants stated That their wasn't no single man cell, And that I was going to have a roommate; regardless of the situation. And Raymond Pitts <sup>(just one)</sup> where cellmates together whos a former (AB) who now works for the gangs call themselves the (M.O.B.) That's why they place him in the cell with me and the first place. He later sexual assault Anderson, duly 2<sup>nd</sup> 10<sup>th</sup>, lett in 12<sup>th</sup> see Exhibits: Exhibits: RPD, 11, 24a, 30,

57. Defendants M-T-C, J. Bradley, G. Walker, T. Toomey, L. Lee, Taplan, P. Hall; Had knowledge the 'GANGS', are the ones writing, calling, extorting my family and friends out of money; they will walk pass me and slate "We Can't Get No Money, OUT OF YOU-IF YOUR DEAD." So they are telling me, they are getting paid for this (Harassment) No one come to (investigated) me. To see if I'm lying telling the Truth! Inmate are waiting until I go to sleep! Get my mail; rewrite family scaring them, from sending me 'money'. But send it to their books / Accts instead (Racketeer & Extortion) or else. "R.I.C.O. Act"

58. 'Mailteam' without any proof, will not send me the (backdate mail log) so I may see if they indeed mail my letter to my family with phone numbers to the Commissioner office, A.C.L.U., U.S. DEPT. OF JUSTICE, F.B.I of Prisons, will its obvious they haven't gotten it; cause the Attacks are still happen right this day (July 7, 2018)

59. Defendants) MTC, J. Bradley, G. Walker, T. Teaney, L. Lee, Taplan, P. Hall, S.K. Smith, had knowledge of all mentioned incident describe in this complaint also. Anderson made sure he file Administrative Remedies office, here at Wilkinson County Correctional Center (WCCC) see, Exhibits : H1001-2, BR014-18A, 20A-B, -21A, 24A-B, 25-A-B, 30, 35, 36, 49, 52; These violation where reported to all the (Above) Defendants, but yet the problem still remain the same.

60.

### LEGAL CLAIMS

61. Defendants) MTC, J. Bradley, G. Walker, T. Teaney, L. Lee, Taplan, P. Hall, S.K. Smith, Psych. Gale, Dr. Dunn, invest. Turner 9m Sup. Arlanthnot, Arrington; (intentionally) denied plaintiff Anderson his Right to be "Protected From Harm", #20.05.01, After telling the counsels in intake staff of my problem; that crashed from Marshall County, Correctional Facility (M.C.C.F.) and Mississippi State Penitentiary (M.S.P.) ~ where plaintiff Anderson was being sexual harassed abuse, assaulted, by staff and inmates; at all those (3) facility These officials all took 'oath' to ensure no harm comes to any

offenders who's under their care. They are being sued for the violation of his 8<sup>th</sup> Amendment of the United States Constitution and caused Anderson pain, suffering, physical injury and Emotional Distress.

62. Defendants) MTC, J. Bradley, G. Walker, T. Toomey, L. Lee, Taplan, P. Hall, S. K. Smith, Busch Dr. Dunn, Gale, Turner, Arbuthnott, Arrington - Allowed and continued to Deprived plaintiff Anderson, of his right to be "Protected From Harm", when he arrived at - Wilkinson County Correctional Facility (WCCF) AFTER the months went by continue to tell each defendant(s) of the P.R.E.A. violation with the (R.I.C.O. Act) being thrown into the play.. But the defendant(s) still played along with Ongoing vibration trying to stop plaintiff from pursuing with Civil action against the (M.S.P.) defendant(s). A. Clear violation of His 5<sup>th</sup>, 8<sup>th</sup>, and 14<sup>th</sup> Amendment to the United States Constitution and Caused Plaintiff Pain, suffering, physical injury, and Emotional Distress.

63. Defendants) Bradley, Toomey, Gale, Dunn, Arbuthnott, Arrington - Have direct knowledge that plaintiff Anderson was being violated of his rights. But they didn't do NOTHING! To stop it, slow it down, instead they edge it on, in it continue on right today! Shake offenders down then give their (contraband) back to the inmate who will have other inmates, to proform other sexual acts and record it by cell phone!! To send back to the corrupted officers and keep the other for themselves, to send around to (other inmates)

who will send it to my family for exchange for my life' for  
'money';

64. Plaintiff Anderson, witnessing Defendants Toomey, Turner, Gale, - comment illegal actions, failing to correct that misconduct, and encouraging the continuation of the misconduct; of (Prison Rape Elimination Act of 2003) by calling me lits, pushing, cursing using all type of profantly laughs, threats not to call (P.R.E.A HOTLINE) Also it NOTE the (MTC) Wilkinson County Correctional Facility has a new phone system and was in activity July 2 2018 so far I havent heard any introduction of a (PREA HOTLINE) on this new phone service / company! <sup>(GTL)</sup> I guessing we'll have to find this new HOTLINE on our own. "No medical treatment," when complaint about a (PREA VIOLATIONS.) Also they are violating plaintiff Anderson rights under the 'Eighth Amendment' to the United States Constitution and causing Anderson, pain, suffering, physical injury and Emotional Distress.

65. Plaintiff Anderson, has NO-PLAIN Adequate or complete remedy at law to redress the wrongs described herein, Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the Declaratory and Injunctive Relief which Plaintiff seeks.

66.

## PRAYER FOR RELIEF

67. WHEREFORE, plaintiff respectfully pray that this court enter judgment, Granting plaintiff Anderson, a declaration that the acts and commissions described herein violate his rights under the Constitution and laws of the United States; and

68. A Preliminary and Permanent injunction ordering defendants MTC, J. Bradley, G. Walker, T. Terney, L. Lee, Toplan, P. Hall, S. K. Smith, Arbuthnot, Arrington, Turner, to cease and never allow it to happen to any other inmate, as long as Wilkinson County Correctional Center, is open for M.D.O.C. offenders; with the "Prison Rape - Elimination Act;" any other physical violence and threats of generic name calling to Plaintiff cause he's a man; and other offenders after him. (2.) Make sure plaintiff is in a "cell by himself," due to him being a 'heavy sleeper,' place inmates to drugging plaintiff with 'sleeping medications' this been happen for years officials need to stop! allowing prisoner to <sup>take</sup> advantage of us offenders with 'sleeping disorder' or that takes psychological medications, stop having gang members to help with any wrong doing or violations of the (M.D.O.C.) Policies, rules and regulations;

69. Granting plaintiff Anderson, 'compensatory damages' in the amount of \$100,000.00.

70. Plaintiff seek 'punitive damages' in the amount of \$50,000.00. Plaintiff Anderson, seek these damages against each defendants jointly and severally.

71. Plaintiff also seek recovery of their costs in this suit  
and any additional relief this Court deems just, proper,  
and equitable.

72.

Respectfully Submitted,  
Levoncel Anderson

73. DATE: July 14, 2018

74.

VERIFICATION

75. I Levoncel Anderson, have read the foregoing complaint and  
hereby verify that the matters alleged therein are true except  
as to matters alleged on 'information and belief,' and as to  
those I believe them to be true. I certify under penalty of  
perjury that the foregoing is true and correct.

76. executed at Wilkinson County on July 14, 2018.

151 Levoncel Anderson  
LEONCEL ANDERSON, PROSE

THE UNITED STATES DISTRICT COURT

Levernell Anderson

plaintiff

vs.

Management Training  
Corporation; et. al.

defendant(s)

Plaintiffs' List of Exhibits) --

and Notice, of Letters, to each  
defendant(s) --

ALSO ENCLOSED ARE AFFIDAVITS: \_\_\_\_\_

CERTIFICATE OF SERVICE

I, Leonzel Anderson, #564185 - Do hereby certify that this day, cause to be mail via United States Postal from the Wilkinson County Correctional Facility (WCCF) From the Inmate Legal Assistance Program (ILAP) to the following:

1. United States District Court  
Office of the Clerk  
501 E. Court Street  
Suite 2,500  
Jackson, Ms. 39201

4. U.S. Court of Appeals  
600 S. Macon Place  
New Orlean, LA. 20130

2. Jim Hors  
Attorney General  
P.O. Box 220  
Jackson, Ms. 39205

3. U.S. D.C.  
911 Jackson Avenue  
Suit 369  
QxFord, Ms. 38655

This is the 15<sup>th</sup> day of August, 2018.

Leonzel Anderson  
LEONZEL ANDERSON  
#564185 - W.C.C.C.  
2999 Hwy. 61- North  
Woodville, Ms. 39069

cc/pf.

DIC. 6308

CA./USPC.  
MAG.  
USDC (Jackson)